

Exhibit A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

ALAMEDA RESEARCH LLC, ALAMEDA
RESEARCH LTD., FTX TRADING LTD.,
WEST REALM SHIRES, INC., and WEST
REALM SHIRES SERVICES, INC.,

Plaintiffs,

-against-

FTX DIGITAL MARKETS LTD., BRIAN C.
SIMMS, KEVIN G. CAMBRIDGE, and
PETER GREAVES, and J. DOES 1–20

Defendants.

Adv. Pro. No. 23-50145 (JTD)

STIPULATION AND PROPOSED SCHEDULING ORDER

This stipulation and proposed scheduling order (the “Stipulation”) is made and entered into in the above-captioned adversary proceeding (the “Adversary Proceeding”) by and among Alameda Research LLC, Alameda Research Ltd., FTX Trading Ltd., West Realm Shires, Inc., and West Realm Shires Services, Inc. (collectively, “Plaintiffs”), and FTX Digital Markets

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

Ltd., Brian C. Simms, Kevin G. Cambridge, and Peter Greaves (each, a “Defendant” and collectively, the “Defendants,” and with the Plaintiffs, the “Parties”), by and through their respective undersigned counsel. In support of the Stipulation, the Parties respectfully state as follows:

WHEREAS, on March 19, 2023, the Plaintiffs commenced the Adversary Proceeding by filing a complaint against Defendants [D.I. 1];

WHEREAS, on March 22, 2023, the Clerk of Court for the United States Bankruptcy Court for the District of Delaware (the “Court”) issued the Summons In An Adversary Proceeding [D.I. 3];

WHEREAS, on April 21, 2023, the Parties submitted the *Stipulation Between the Parties to Extend the JPL Defendants’ Deadline to Answer or Otherwise Respond to the Complaint* [D.I. 4], which, among other things, (i) extended the deadline for the Defendants to answer or otherwise respond to the Complaint through and including May 8, 2023, and (ii) scheduled an initial pre-trial conference for May 17, 2023;

WHEREAS, on May 8, 2023, the Defendants filed the *Motion of FTX Digital Markets Ltd. and the Joint Provisional Liquidators to Dismiss the Complaint or, in the Alternative, to Abstain from Ruling on Counts I-VI* [D.I. 6] (the “Motion to Dismiss”);

WHEREAS, on May 23, 2023 the court entered an order approving the *Stipulation Between the Parties Regarding Briefing Deadlines for the JPL Defendants’ Motion to Dismiss* [D.I. 11], which (i) extended the deadline for the Plaintiffs to file a response to the Motion to Dismiss amend their complaint as a matter of course pursuant to Fed. R. Bankr. P. 7015 and Fed. R. Civ. P. on or prior to June 14, 2023, and (ii) set the deadline for Defendants to file a reply in

support of their Motion to Dismiss or answer or move with respect to the amended complaint on or prior to July 10, 2023.

NOW, THEREFORE, it is hereby stipulated and agreed, and upon approval by the Court it shall be **SO ORDERED**:

1. Proposed Scheduling Order. The Parties agree to the following proposed scheduling order (the “Proposed Scheduling Order”):

EVENT	DEADLINE
Start of Fact Document Discovery	Thursday, June 8, 2023
Substantial Completion of Fact Document Discovery	Tuesday, August 22, 2023
Start of Fact Depositions	Wednesday, August 23, 2023
Completion of Fact Depositions	Monday, October 7, 2023
Deadline to Exchange Expert Witness Disclosures and Reports	Monday, October 7, 2023
Deadline to Exchange Rebuttal Expert Witness Disclosures and Reports	Friday, October 27, 2023
Expert Discovery Closes	Friday, November 3, 2023
Dispositive Motion Deadline	Monday, November 6, 2023
Deadline to File a Response to Dispositive Motions	Monday, December 4, 2023
Deadline to File a Reply in Support of Dispositive Motions	Friday, December 22, 2023
Trial (subject to the Court’s schedule) ²	Wednesday, February 21, 2024

2. Pending approval of this Stipulation by the Court, each of the Parties agrees that it is and will be bound by this Stipulation and waives any right to object to approval by the Court. In the event that this Stipulation is not approved by the Court, it will be null and void and have no force or effect whatsoever except as may be otherwise agreed in writing by the Parties.

² The Parties anticipate that pre-trial scheduling matters will be agreed at a later date.

3. If approved by the Court, the Proposed Scheduling Order shall be modified only by a writing signed by all Parties approved by the Court, or otherwise upon entry of an order of the Court entered upon notice to the Parties.

4. Neither this agreement by the Parties or approval of this Stipulation by the Court shall be a waiver by the Parties of the right to (i) file any motion for summary judgment at any time in accordance with Fed. R. Bankr. P. 7056 and Fed. R. Civ. P. 56; or (ii) file any other motion or adversary proceeding in the Court.

5. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of the Proposed Scheduling Order.

Dated: June 12, 2023
Wilmington, Delaware

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